

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In re Bair Hugger Forced Air Warming
Products Liability Litigation

This Document Relates To:
All Actions

MDL No. 15-2666 (JNE/FLN)

**DEFENDANT 3M COMPANY'S
MEET AND CONFER STATEMENT
FOR MOTION FOR LEAVE TO
TAKE FOR LEAVE TO TAKE
ADDITIONAL DEPOSITIONS AND
CONTINUE THE DEPOSITION OF
SCOTT AUGUSTINE**

I, Benjamin W. Hulse, representing 3M Company (3M), certify that I and my partner, Corey L. Gordon, conferred with Plaintiffs and counsel for the deponents by an email to Randy Benham, Ben Gordon, Jan Conlin, Gabriel Assaad, and Genevieve Zimmerman on May 3, 2017 to discuss this Motion For Leave to Take Depositions After Close of Discovery.

In an email on May 4, 2017, counsel for Plaintiffs confirmed that they would oppose 3M's Motion.

Dated: May, 4 2017

Respectfully submitted,

s/Benjamin W. Hulse

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